

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION	NO. 2:18-md-02323-AB MDL NO.2323
Kevin Turner and Shawn Wooden, on behalf Of themselves and others similarly situated, Plaintiffs, v. National Football League and NFL Properties, LLC, successor-in-interest to NFL Properties, Inc., Defendants	No. 2:12-md-02323-AB MDL NO. 2323
THIS DOCUMENT RELATES TO: ALL ACTIONS	Hon. Anita B. Brody

**SUPPLEMENTAL MEMORANDUM
OF CLASS COUNSEL IN SUPPORT OF MOTION FOR RECONSIDERATION**

Undersigned Class Counsel respectfully submits this Supplemental Memorandum in Support of the Motion for Reconsideration of the Court's April 11, 2019 Order.

Having heard from the Claims Administrator on May 7 the reasons that form the basis of the new MAF rules, Class Counsel is still opposed to them in their present form, in part, because they constitute a "change, modification, amendment or addition" to the Agreement without the consent of Class Counsel. That consent is required by, among other things, paragraph 18 of the Court's Final Approval Order. The changes adversely impact the class.

We also write to say that we engaged in discussions with Mr. Orran Brown in the courtroom after the May 7 hearing. During those discussions, we offered him examples of

suggested edits we made to the Court's new MAF rules that he and the Court might consider. Mr. Brown requested that we send him our suggested edits so he could review them. We sent them to him by email on May 7, and we attach them here as Exhibits 1 and 2, so the Court can consider them as well. Exhibit 1 is a clean copy of our edited MAF Rules. Exhibit 2 is a Comparative version in color for the Court's convenience.

As Class Counsel, we believe the suggested edits will benefit and enhance the MAF procedures, and they will not constitute a change, modification, amendment or addition to the Agreement that is adverse to the Class.

We respectfully suggest that if we are granted leave to have discussions with Mr. Brown and/or the Special Masters concerning the MAF rules, we may be able to reach a compromise that leads Class Counsel to withdraw the Motion for Reconsideration.

Dated: May 10, 2019

Respectfully submitted,

/s/ Gene Locks
Gene Locks, Esq.
David D. Langfitt, Esq.
LOCKS LAW FIRM
The Curtis Center
Suite 720 East
601 Walnut Street
Philadelphia, PA 19106
Phone: 215-893-3423
Fax: (215) 893-3444
glocks@lockslaw.com
dlangfitt@lockslaw.com

Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that on this date a true and correct copy of the foregoing Supplemental Memorandum of Class Counsel was filed and consequently served via the Electronic Filing System on all counsel of record in Case No. 2:12-md-02323-AB, MDL No. 2323, and 2:18-md-2323-AB.

DATE: May 10, 2019

/s/ David D. Langfitt
David D. Langfitt